

Attachment A

Ventura County 75 ppb 8-hour Ozone Reasonable Further Progress Demonstration including Transportation Conformity Rounding Margins (tons per day, summer planning inventory)

Year	ROG		
	2011	2017	2020
Baseline ROG	38.1	31.7	32.1
2020 Transportation Conformity Rounding Margin		--	0.7
Baseline ROG + Rounding Margin		31.7	32.8
Required % change since 2011 (ROG or NOx)		18%	27%
Target ROG Level		31.2	27.8
Apparent Shortfall (-)/ Surplus (+) in ROG		-0.5	-5.0
Apparent Shortfall (-)/ Surplus (+) in ROG, %		-1.4%	-13.2%
ROG Shortfall previously provided by NOx Substitution, %		0%	1.4%
Actual ROG shortfall (-)/ surplus (+), %		-1.4%	-11.7%
Year	NOx		
	2011	2017	2020
Baseline NOx	26.0	18.5	16.6
2020 Transportation Conformity Rounding Margin		--	0.9
Baseline NOx + Rounding Margin		18.5	17.5
Change in NOx since 2011		7.5	8.5
Change in NOx since 2011, %		28.8%	32.8%
NOx reductions since 2011 already used for ROG substitution through last milestone year, %		0%	1.4%
NOx reductions since 2011 available for ROG substitution in this milestone year, %		28.8%	31.4%
NOx reductions since 2011 used for ROG substitution in this milestone year, %		1.4%	11.7%
NOx reductions since 2011 surplus after meeting ROG substitution needs in this milestone year, %		27.4%	19.6%
Total shortfall for RFP		0%	0%
RFP Met?		YES	YES

Attachment B
Ventura County 75 ppb 8-hour Ozone Attainment Demonstration
Sensitivity Analysis with Transportation Conformity Rounding Margin

The Ventura County modeled design value (DV) for the 2020 attainment year is 72.5 parts per billion (ppb), 2.5 ppb below the standard. Table 1 below shows the DV at the design site for the 2012 base year and the 2020 attainment year, the corresponding ROG and NOx emissions and the 2020 rounding margins that were included in the attainment year transportation conformity emissions budget.

Each ppb of DV change represents 1.78 tons per day (tpd) of total ROG and NOx emissions reductions (12.8 tpd / 7.2 ppb). Subsequently, the 2.5 ppb difference between the modeled Ventura County DV and the 75 ppb standard represents 4.45 tpd of ROG and NOx emissions (1.78 tpd/ppb X 2.5 ppb).

Table 1 Ventura County Design Values, Emissions and Transportation Conformity Rounding Margin (Simi-Valley-Cochran Street Design Site)

	2012	2020	2012-2020 Reductions	Total ROG and NOx Emission Reductions	2020 Rounding Margins	Total 2020 Rounding Margins
DV (ppb)	79.7	72.5	7.2	--	--	--
ROG (tpd)	37.8	33.5	4.3	12.8	0.7	1.6
NOx (tpd)	40.6	32.1	8.5		0.9	

Notes:

Numbers may not match due to rounding

2012 and 2020 DV: 2016 Ventura County Air Quality Management Plan pg. I-10 Appendix I Ventura County Community Multiscale Air Quality Model Performance Analysis

2012 and 2020 ROG: 2016 Ventura County Air Quality Management Plan Pg. 71 Table 4-5 ROG Emissions

2012 and 2020 NOx: 2016 Ventura County Air Quality Management Plan Pg. 72 Table 4-6 NOx Emissions

DV = design value

ppb = parts per billion

tpd = tons per day

ROG = reactive organic gases

NOx = oxides of nitrogen

Therefore, this analysis shows that Ventura County attainment demonstration can accommodate an increase of 4.45 tpd in total NOx and ROG emissions. The 1.6 tpd total rounding margin is below this amount. In addition, this analysis is conservative because it does not consider upwind sources. Modeling shows that air quality improvements in downwind areas such as Ventura County are more dependent on

decreases in emissions that originate from upwind locations than on decreases in emissions from within the nonattainment area.¹

¹ Title 17 California Code of Regulations, section 70500(c) Transport Identification Table.